

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X

PAMELA GELLER,

Plaintiff,

-against-

Case No. 20 Civ. 4653 (ER)

ANDREW CUOMO, in his official capacity as Governor of the State of New York; BILL DE BLASIO, individually and in his official capacity as Mayor, City of New York; and DERMOT SHEA, individually and in his Official capacity as the Police Commissioner, City of New York,

**STIPULATION AND  
~~PROPOSED~~ ORDER STAYING  
PROCEEDINGS PENDING  
INTERLOCUTORY APPEAL**

Defendants.

-----X

WHEREAS the Court denied the Plaintiff's motion for a preliminary injunction by Opinion and Order dated August 3, 2020, see Dkt. No. 32 ("August 3 Order");

WHEREAS the Plaintiff has appealed that decision to the United States Court of Appeals for the Second Circuit, see Dkt. No. 33; and

WHEREAS all parties desire to avoid the complications inherent in litigating one case in two forums, and to conserve judicial resources;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and among the undersigned counsel for the parties, that:

1. This action is stayed pending the resolution of all appeals of the Court's August 3 Order;
2. Defendants' answers or responsive motions shall be due thirty days after the Second Circuit issues its mandate or, in the event that a party seeks further review from the Supreme Court, thirty days after the Supreme Court's ruling or denial of *certiorari*; and
3. This stipulation may be executed in counterparts, and a facsimile or email signature on this stipulation shall be treated as an original.

Dated: August 7, 2020

AMERICAN FREEDOM LAW CENTER  
Attorney for Plaintiff Pamela Geller

By: /s/ David Yerushalmi

David Yerushalmi, Esq.  
383 Kingston Avenue, Suite 103  
Brooklyn, NY 11216  
(646) 262-0500  
[dyerushalmi@aflc.us](mailto:dyerushalmi@aflc.us)

Robert J. Muise, Esq.  
PO Box 131098  
Ann Arbor, MI 48113  
(734) 635-3756  
[rmuise@americanfreedomlawcenter.org](mailto:rmuise@americanfreedomlawcenter.org)

LETITIA JAMES  
Attorney General  
State of New York  
Attorney for Governor Cuomo

By: /s/ James M. Thompson

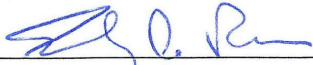
Andrew Amer  
Special Litigation Counsel  
James M. Thompson  
Assistant Attorney General  
28 Liberty Street  
New York, New York 10005  
(212) 416-6556  
[andrew.amer@ag.ny.gov](mailto:andrew.amer@ag.ny.gov)  
[james.thompson@ag.ny.gov](mailto:james.thompson@ag.ny.gov)

JAMES JOHNSON  
Corporation Counsel  
City of New York  
Attorney for Mayor De Blasio and  
Commissioner Shea

By: /s/ Aimee K. Lulich

Aimee K. Lulich  
Assistant Corporation Counsel  
Glenn E. Fucci  
Assistant Corporation Counsel  
100 Church Street  
New York, New York 10007  
(212) 356-2369  
[alulich@law.nyc.gov](mailto:alulich@law.nyc.gov)  
[gfucci@law.nyc.gov](mailto:gfucci@law.nyc.gov)

SO ORDERED:

A handwritten signature in blue ink, appearing to read "Edgardo Ramos", is positioned above a horizontal line.

Edgardo Ramos, U.S.D.J

Dated: August 7, 2020

New York, New York